

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LAURA ALLEN INDIVIDUALLY AND  
AS ADMINISTRATRIX OF THE ESTATE  
OF THE LATE DAN ALLEN, AND AS  
NEXT FRIEND OF TAYLOR ALLEN  
AND DANIELLE ALLEN;  
AND MARK ALLEN

Plaintiffs

v.

MARTIN SURFACING, INC.; MARTIN  
SURFACING, A DIVISION OF  
SOUTHWEST RECREATION;  
RONALD RYBA; SOUTHWEST  
RECREATIONAL INDUSTRIES, INC.  
d/b/a MARTIN SURFACING; REED J.  
SEATON; ROBERT N. WOLESENSKY,  
JR., DYNAMIC SPORTS  
CONSTRUCTION, INC. AND DOES

Defendants

CIVIL ACTION NO. 05-40048-FDS

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
2005 AUG -5 A 11:49

**PLAINTIFFS' INITIAL DISCLOSURES  
PURSUANT TO FED. R. CIV. P. 26(a)(1) AND LOCAL RULE 26.2**

NOW COMES the Plaintiffs and makes the following as their Initial Disclosures herein:

1. Rule 26.1(b)(2)(a): All Persons Known to this Defendant, Who Witnessed the Occurrence or Have Substantial Discoverable Information Regarding Same:

1. Reed J. Seaton
2. Robert N. Wolsensky
3. Ronald Ryba
4. Dennis Allen
5. Laura Allen
6. Taylor Allen
7. Danielle Allen
8. Mark Allen
9. Representative(s), Martin Surfacing, Inc.

10. Representative(s), Southwest Recreational Industries, Inc.
11. Representative(s), Dynamic Sports Construction, Inc.
12. Representative(s), College of the Holy Cross
13. Henry Corazini
14. Scott Marrow
15. Mary Herarb
16. Paul Bachia
17. Mike Pedone
18. Bob Griffin
19. Bob Bradly
20. Vinny Sinagra
21. Lee Hall
22. Larry Napolitano
23. Bob Neville
24. Linda George
25. Nina Robinson
26. Ann Seleskin
27. Jim Cavanaugh
28. Meg Gallagher
29. Leo Fanning
30. Mary Kay O'Connor

2. Rule 26.1(b)(2)(b): All Opposing Parties From Whom Statements Have Been Taken:

None.

3. Rule 26.1(b)(2)(c): All Government Agencies Known to Have Investigated Occurrence:

None.

4. List of Documents Voluntarily Provided Herewith In Lieu of Formal Discovery:

Plaintiff agrees to make available the following:

- a. Medical Release for Defendant to obtain medical records dating back 3 years before the incident (Medical Records in our possession remain available to the Defendant); and
- b. Death Certificate.

PLAINTIFFS,  
Through their counsel,



Robert J. Bonsignore, Esq.  
BONSIGNORE & BREWER  
23 Forest Street  
Medford, MA 02155  
Phone: 781-391-9400  
BBO # 547880

Dated: August 3, 2005

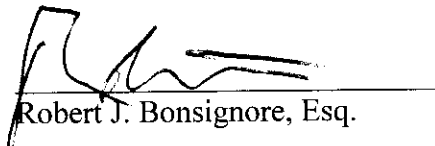
**CERTIFICATE OF SERVICE**

I, Robert J. Bonsignore, certify that on August 3, 2005, a copy of the foregoing Plaintiffs' Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2 was mailed, postage prepaid, to the following:

Joseph M. Noone, Esq.  
James T. Sullivan, Esq.  
Avery, Dooley, Post & Avery, LLP  
90 Concord Avenue  
Belmont, MA 02478

Lee Stephen MacPhee, Esq.  
Gareth W. Notis, Esq.  
Morrison, Mahoney, LLP  
250 Summer Street  
Boston, MA 02210

P. Douglas Barr, Esq.  
Stoll, Keenon & Park, LLP  
300 West Vine Street, Suite 2100  
Lexington, KY 40507



Robert J. Bonsignore, Esq.